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JASON D. WRIGHT
ADMITTED IN NEW YORK, VIRGINIA
AND THE DISTRICT OF COLUMBIA
OF COUNSEL

September 6, 2019

By ECF

The Honorable Loretta A. Preska
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

*Re: United States v. Steven Donziger;
Criminal Docket Number 19-561 (LAP); (Civil Docket No. 11-691)*

Dear Judge Preska:

On behalf of Steven Donziger, I write to request an amendment to Mr. Donziger's bond. Ms. Glavin advises me that she has no objection. Pretrial Services Officer Harmon has no objection as described herein.

To accommodate me, Mr. Donziger has agreed to meet with me from time to time at my home office in Hudson County, New Jersey, where I spend considerable time working and occasionally meet clients. I live directly across the Hudson River from Manhattan, one PATH or ferry stop away. For example, I have an argument in the Second Circuit this Monday and would prefer that Mr. Donziger travel to me this weekend rather than me devoting time in transit to his Upper West Side apartment or my Midtown office. Even if this request is not approved in time for this weekend, I anticipate other circumstances will arise where meeting at my home office would be more time-efficient for me.

Ms. Glavin has no objection to this request provided, of course, that Ms. Harmon approves in advance of each visit, and Ms. Harmon has no objection provided that she approves in advance of each visit. I have provided Ms. Harmon with my exact street address.

Thus, I respectfully request that Mr. Donziger's bond be amended to permit travel to Hudson County, New Jersey, to meet with me, subject to the protocols of home confinement.

I appreciate the Court's consideration.

Respectfully submitted,

/s/

Andrew J. Frisch

cc: Ms. Rita Glavin
Ms. Lea Harmon